

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: : CASE NUMBER: 05-08741-EAG  
RAUL FELIX GARCIA RINALDI : CHAPTER 13  
Debtor(s) :  
\_\_\_\_\_

2012 DEC 20 PM 1:26  
U.S. BANKRUPTCY COURT  
CLERK'S OFFICE  
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**MOTION**

TO THE HONORABLE COURT:

Comes now, William Diaz Nieves, Aida L. Diaz Nieves, Nerides Diaz Nieves, Rafael Diaz Nieves, Rosalina Diaz Nieves and Orlando Diaz Nieves through the undersigned attorney, and very respectfully submits this motion:

1. We respectfully inform this Honorable Court that the documents required in accordance to PR LBR 3011-1 were submitted in our motion dated February 17, 2012. We submit with these motion copies of the documents required and the form PR LBF C subscribed by the petitioners'.

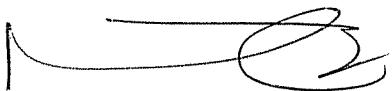
3. We respectfully request from this Honorable Court to accept our motion and authorized the withdrawal of funds.

WHEREFORE, very respectfully request that this Honorable Court to accept our reconsideration and order the withdrawal of funds to plaintiffs.

I HEREBY CERTIFY: That on this same date, I will send notification of this motion to Alejandro Oliveras Rivera, Esq. Chapter 13 Trustee, PO Box 9024062, San Juan, PR 00902-4062.

RESPECTFULLY SUBMITTED

At Aguadilla, Puerto Rico, this 14 days of December, 2012.



**ISRAEL ROLDAN GONZALEZ**

Attorney for Plaintiff  
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P.R. LBF C

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

RAUL FELIX GARCIA RINALDI

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In re:

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CASE NO.05-08741EAG

Debtor(s)

:

Chapter

:

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**PETITION FOR PAYMENT OF UNCLAIMED FUNDS**

NOW APPEARS (petitioner) William Diaz Nieves, of (address) Barrio Aceitunas, Moca PR 00676, and states that on (date) December, 30, 2011 (name) Mr. Diaz became entitled to receive \$ 25,000.00 as a distribution in the above-entitled case, and now appears on the records of this Court as the owner of said funds. The amount requested is being held in the Treasury of the United States as unclaimed funds.

Petitioner represents that he/she/it is entitled to receive the requested funds based upon (check box(es) that apply):

petitioner is the OWNER of said funds being the owner appearing on the records of this Court;

petitioner is the assignee of the owner's claim to said funds; as evidenced in the attached Affidavit or Assignment of Right;

petitioner is the owner's successor in interest, as evidenced in the attached Affidavit or Assignment of Right;

petitioner is the personal representative of the owner's estate, as evidenced in the attached Affidavit and/or other identifying documents; or

petitioner is named in a POWER OF ATTORNEY by (grantor) William Diaz-Nieves valid under the laws of the Commonwealth of Puerto Rico, that empowers petitioner to collect the unclaimed funds described above on behalf of grantor:

- as the owner of the claim;
- as the owner's attorney-at-law, with authorization to receive said funds;
- as the assignee of the owner's claim to said funds;
- as the owner's successor in interest; or
- as the personal representative of the owner's estate.

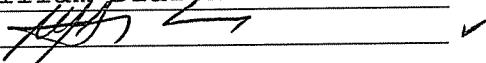
Your petitioner submits with this petition the following document(s) as proof of the petitioner's identity and status, and the owner's claim of entitlement:

[List all documents that are attached, e.g., copy of government-issued photo i.d., power of attorney, formal assignment; letter of appointment, court order, etc.] The original are with Motion dated February 17, 2012

1. Authorization for Attorney representation
2. Licence copy
3. S.S. xxx-xx-2601

WHEREFORE, your petitioner submits to the personal jurisdiction of this Court and requests that it enter an order directing payment of the unclaimed funds described above to the petitioner, or – if the petitioner is not the owner – to the petitioner on behalf of the owner, in accordance with the documents submitted in support of this petition.

The petitioner declares under penalty of perjury that the foregoing is true and correct:

Name of Petitioner: William Diaz, Nieves  
Signature of Petitioner:  ✓  
Title: \_\_\_\_\_  
Date: December 14, 2012

#### NOTICE OF RESPONSE TIME

Within twenty (20) days after service as evidenced by the certification – and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006(f) if you were served by mail – any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, must serve and file an objection or other appropriate response to this paper with the Clerk's Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is timely filed within the time allowed herein, the paper will be deemed unopposed, unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice otherwise requires.

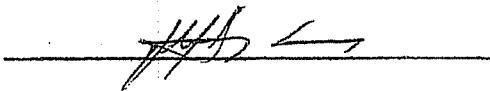
#### CERTIFICATE OF SERVICE

The petitioner mailed a copy of this petition and all attachments to the Office of the United States Attorney for the District of Puerto Rico, at Torre Chardón Suite 1201, 350 Carlos Chardón Ave., San Juan, PR 00918, on (date) December 14, 2012

### AUTORIZACIÓN

Por la presente se autoriza al Lcdo. Israel Roldán González, quien es nuestro abogado en el caso de quiebra del Dr. Raul Felix Garcia Rinaldi, caso que esta radicado bajo el Capítulo 13, número 05-08741-EAG, en el Tribunal de Quiebras de Puerto Rico, a suministrar nuestra información y solicitar el desembolso de los fondos depositados en el Tribunal.

Para que así conste, firmo la presente hoy 15 de febrero de 2012.



### AUTHORIZATION

We hereby authorize Israel Roldan Gonzalez, Esq., who is our legal representation in the Bankruptcy Case of Dr. Raul Felix Garcia Rinaldi filed under case number 05-08741-EAG, under Chapter 13 in the Bankruptcy Court of Puerto Rico to provide our information and request the disbursement of funds deposited in with the Court.

For the record, I sign this day of 15 February 2012.

